

EXHIBIT A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

RUTH V. BRIGGS, .
Plaintiff, .
vs. . 601 Market Street
. Philadelphia, Pennsylvania 19106
. July 17, 2018
. .
TEMPLE UNIVERSITY, .
. .
Defendants. .

TRANSCRIPT OF TRIAL
DAY 2 - P.M. SESSION
BEFORE THE HONORABLE ROBERT F. KELLY
UNITED STATES DISTRICT JUDGE
AND A JURY

APPEARANCES:

For the Plaintiff: Laura Carlin Mattiacci, Esq.
Stephen G. Console, Esq.
Rahul Munshi, Esq.
CONSOLE MATTIACCI LAW, LLC
1525 Locust Street
Philadelphia, Pennsylvania 19102

For the Defendant: Richard R. Harris, Esq.
Rachel Fendell Satinsky, Esq.
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Audio Operator: Electronically Recorded
by Court Personnel

Transcription Company: JDR Acquisition, LLC./
Advanced Transcription
1880 John F. Kennedy Boulevard
6th Floor
Philadelphia, Pennsylvania 19103
(855) 204-8184

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1 Q Your request?

2 A My request.

3 Q Because you wanted help?

4 A I wanted to see if I had Alzheimer's like my father.

5 Q But you did not have that?

6 A I did not have that.

7 Q Ms. Briggs, are you currently employed?

8 A Yes, I am.

9 Q Your current employment, I believe you're a health --
10 home healthcare assistant?

11 A Aide, right. Uh-huh. Yes.

12 Q And as I also understand your testimony, you have not
13 looked for a position since you've been in that current role?

14 A No.

15 Q Okay. And it's -- your salary currently is
16 approximately half of what you made when you were working at
17 Temple University?

18 A Or less. Yeah.

19 Q And the position that you currently have is full-time?

20 A Yes, it is.

21 Q Okay. And as I understand your testimony, you have a
22 degree, correct?

23 A Yes, I do.

24 Q That you actually received with honors?

25 A Yes, I did.

EXHIBIT B

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

RUTH V. BRIGGS,

. Case No. 1:15-cv-00902-LS

Plaintiff, .

vs.

. 601 Market Street

. Philadelphia, Pennsylvania 19106

. July 18, 2018

TEMPLE UNIVERSITY,

Defendants..

TRANSCRIPT OF TRIAL

DAY 3 - P.M. SESSION

BEFORE THE HONORABLE ROBERT F. KELLY

UNITED STATES DISTRICT JUDGE

AND A JURY

APPEARANCES:

For the Plaintiff: Laura Carlin Mattiacci, Esq.

Stephen G. Console, Esq.

Rahul Munshi, Esq.

CONSOLE MATTIACCI LAW, LLC

1525 Locust Street

Philadelphia, Pennsylvania 19102

For the Defendant:

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1 presence, but in the presence of counsel representing the
2 parties. All right.

3 MS. MATTIACCI: Thank you.

4 The question to Dr. Wu:

5 "Are you generally familiar within your capacity as
6 a manager that there are federal and state laws that protect
7 individuals from certain types of discrimination?

8 "Witness: Yes, I know that.

9 "And are you familiar within your capacity as a
10 manager at Temple that Temple has anti-discrimination and
11 anti-retaliation policies?

12 "Yes.

13 "Do you consider these policies of anti-
14 discrimination and anti-retaliation important?

15 "Oh, yeah, very important.

16 "Why?

17 "The reason that people -- that we should not
18 discriminate people based on age, gender."

19 And then the last one:

20 "Did you ever yell in Chinese in the workplace?

21 "Answer: Yes, sometimes with my students, Chinese
22 students."

23 That's all.

24 THE COURT: All right.

25 MS. SATINSKY: Your Honor, may we see you at

EXHIBIT C

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IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

- - -

RUTH V. BRIGGS,	:	No. 16-cv-00248
Plaintiff	:	
	:	
vs.	:	
	:	
TEMPLE UNIVERSITY,	:	
Defendant	:	

- - -

Thursday, May 25, 2017

- - -

Videotaped deposition of RUTH V. BRIGGS, taken pursuant to notice, was held at the offices of Littler Mendelson, Three Parkway, 1601 Cherry Street, Suite 1400, Philadelphia, Pennsylvania 19102, beginning at 10:07 a.m., on the above date, before DEBRA ANNE GERSTEMEIER, Registered Professional Reporter and Notary Public of the Commonwealth of Pennsylvania.

- - -

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1 A. I did know that it was a policy, yes.

2 - - -

3 (Whereupon, Temple University
4 Polices and Procedures Manual memo,
5 Bates No. BRIGGS 94-96, was marked
6 as D Exhibit No. 6 for
7 identification.)

8 - - -

9 THE WITNESS: There's nothing
10 more with this (indicating)?

11 MS. FENDELL-SATINSKY: Not
12 right now.

13 THE WITNESS: Okay.

14 MS. FENDELL-SATINSKY: You can
15 put it to the side.

16 BY MS. FENDELL-SATINSKY:

17 Q. The court reporter has given you a
18 document that's been marked as D-6.

19 A. Uh-huh.

20 Q. Is that a "yes"?

21 A. Yes. I'm sorry. "Yes."

22 Q. That's okay.

23 Same first question to you is whether
24 you've seen this document before.

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1 A. Yes, I have.

2 Q. And if you look down at the Bates
3 numbers in right-hand corner, you see it
4 says "BRIGGS 94" on the first page?

5 A. Yes, I do.

6 Q. And I will tell you that means that
7 this is a document that you or your attorney
8 produced to us from you. Okay?

9 A. Yes.

10 Q. Did you have access to this document
11 throughout your employment at Temple?

12 A. Yes.

13 Q. And did you understand this document
14 during your employment at Temple?

15 A. Yes.

16 Q. And you understand that Temple
17 prohibits discrimination and harassment,
18 correct?

19 A. Yes.

20 MR. MUNSHI: Objection to
21 form.

22 Go ahead.

23 BY MS. FENDELL-SATINSKY:

24 Q. You understood that was Temple's

RUTH V. BRIGGS

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1 policy during your employment, correct?

2 A. Yes.

3 Q. I want to go back quickly to earlier
4 we talked about Mr. Wacker.

5 A. The --

6 Q. You can put that aside --

7 A. Oh, okay.

8 Q. -- for now.

9 A. Okay, okay.

10 Q. And when we talked about Dr.

11 Wacker --

12 A. Mr. Wacker.

13 Q. Mr. Wacker. I'm giving everybody
14 additional titles or not enough titles.

15 When we talked about Mr. Wacker, you
16 gave me a list of things that Dr. Wacker
17 asked you to do that you found morally
18 objectionable, if not illegal.

19 Do you remember that?

20 A. Yes.

21 Q. Why do you think Dr. -- let me ask it
22 again.

23 Why do you think Mr. Wacker asked you
24 to do those things you identified as morally